

Ramon Rossi Lopez - [rlopez@lopezmchugh.com](mailto:rlopez@lopezmchugh.com)  
(California Bar Number 86361; admitted *pro hac vice*)  
Lopez McHugh LLP  
100 Bayview Circle, Suite 5600  
Newport Beach, California 92660  
949-812-5771

Robert W. Boatman (009619) - [rwb@gknet.com](mailto:rwb@gknet.com)  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
602-530-8000

*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

In Re Bard IVC Filters Products  
Liability Litigation

No. MD-15-02641-PHX-DGC

**PLAINTIFFS' NOTICE OF SERVICE  
OF DISCLOSURE OF EXPERT  
TESTIMONY**

Plaintiffs hereby provide notice that they have served on this date the expert reports in accordance with Federal Rule of Civil Procedure 26(a)(2) of the following expert witnesses:

*David Garcia, M.D. and Michael B. Streiff, M.D.*

*Robert M. McMeeking, Ph.D., NAE, FREng, FRSE, LFASME*

*Robert O. Ritchie, Ph.D.*

*Suzanne Parisian, M.D.*

*Rebecca Betensky, Ph.D.*

*David A. Kessler, M.D.*

*Robert L. Vogelzang, M.D.*

Plaintiffs further designate and incorporate the content, substance, and opinions of the following expert witnesses in this MDL previously served on Defendants on February 10, 2017 in the case of *Barraza, et al. v. C.R. Bard, Inc., et al.* (United States District Court, District of Arizona, class action Case No. 2:16-cv-01374-DGC):

1 *Rebecca Betensky, Ph.D.*

2 *David W. Bates, M.D., MSc*

3 *Steven M. Hertz, M.D.*

4 *Mark J. Eisenberg, M.D.*

5 Finally, Plaintiffs also designate and incorporate the content, substance, and  
6 opinions of Dr. David A. Kessler previously served on Defendants on September 27, 2016  
7 in the Circuit Court of the case of *Austin v. C. R. Bard, Inc., et al.* (17<sup>th</sup> Judicial Circuit, in  
8 and for Broward County, Florida, Case No.: CACE-15-008373, Div: 07).

9 Plaintiffs are filing this notice in lieu of filing the original discovery papers  
10 pursuant to L.R. Civ. 5.2.

11 RESPECTFULLY SUBMITTED this 3rd day of March, 2017.

12 LOPEZ McHUGH LLP

13  
14 By: /s/Ramon R. Lopez  
15 Ramon Rossi Lopez (CA Bar No. 86361)  
16 (admitted *pro hac vice*)  
100 Bayview Circle, Suite 5600  
Newport Beach, California 92660

17 GALLAGHER & KENNEDY, P.A.  
18 Robert W. Boatman  
2575 East Camelback Road  
19 Phoenix, Arizona 85016-9225

20 *Attorneys for Plaintiffs*

21 **CERTIFICATE OF FILING**

22  
23 I hereby certify that on this 3<sup>rd</sup> day of March, 2017, I electronically transmitted the  
24 attached document to the Clerk's Office using the CM/ECF System for filing and  
25 transmittal of a Notice of Electronic Filing.

26  
27 /s/Deborah Yanazzo  
28 Deborah Yanazzo